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ABSTRACT

In this document a regional review of the Emergency School Aid Act (ESAA) is presented. The technique used for the review was the structured interview in which each regional office program manager was asked the same set of questions, all dealing with the administrative aspects of the ESAA program. The questions contained in the interview covered the following areas: technical assistance, program dissemination, application review process, proposal processing, paneling process, resubmit process, evaluation, training of regional office staff, program officer assignments, NACEEC visits, and knowledge about and use of the handbook for integrated education. The overall approach of the review was one of a survey of the general administrative management trends in the region rather than of an evaluation. (Author/AM)

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REGIONAL REVIEW OF ESAA APPLICATION PROCESSING

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U.S. DEPARTMENT OF HEALTH,
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INTRODUCTION

AS STATED IN SECTION 716(A), THE NATIONAL ADVISORY COUNCIL ON EQUALITY OF EDUCATIONAL OPPORTUNITY SHALL (1) ADVISE THE ASSISTANT SECRETARY WITH RESPECT TO THE OPERATION OF THE PROGRAM AND (2) REVIEW THE OPERATION OF THE PROGRAM WITH RESPECT TO ITS EFFECTIVENESS IN ACHIEVING ITS PURPOSE AS STATED IN SECTION 702(B).

IN PARTIAL FULFILLMENT OF THIS CHARGE, THE LEGISLATIVE & ADMINISTRATIVE TASK FORCE, CHAIRED BY EDWARD MEYERS, UNDERTOOK AN ADMINISTRATIVE REVIEW OF THE TEN REGIONAL OFFICES.

THE TECHNIQUE USED WAS THE STRUCTURED INTERVIEW IN WHICH EACH REGIONAL OFFICE PROGRAM MANAGER WAS ASKED BASICALLY THE SAME SET OF QUESTIONS DEALING WITH THE ADMINISTRATIVE ASPECTS OF THE ESAA PROGRAM. THIS PROCEDURE WAS UNDERTAKEN IN ORDER TO ASCERTAIN THE CONSISTENCY OF REGIONAL OFFICE IMPLEMENTATION OF NATIONAL PROGRAM POLICY. OTHER ISSUES SURFACED AS THE REVIEW PROCEEDED SO ADDITIONAL QUESTIONS WERE ADDED.

THE QUESTIONS CONTAINED IN THE INTERVIEW WERE DERIVED FROM THE AREAS OF RESPONSIBILITY COVERED IN THE DECEMBER, 1976 USOE/EEO PROGRAM MANAGEMENT PROCEDURES MANUAL. THESE AREAS INCLUDED: PROGRAM DISSEMINATION, TECHNICAL ASSISTANCE, TRAINING, REVIEW PANELISTS, APPLICATION REVIEW PROCESS, RESUBMISSION, PRE-GRANT SITE REVIEWS, PROGRAM ADMINISTRATION, WASHINGTON REVIEW AND MONITORING.

BECAUSE MEMBERS OF THE TASK FORCE HAD BEEN TOLD REPEATEDLY THAT EACH REGION WAS SO UNIQUE, IT WAS DETERMINED THAT EVERY REGIONAL OFFICE SHOULD BE INCLUDED IN THE INTERVIEW. IN THIS WAY, EACH PROGRAM MANAGER WOULD RECEIVE AN OPPORTUNITY TO SUGGEST IMPROVEMENTS IN THE PROGRAM. THIS WOULD ALSO AFFORD A BETTER UNDERSTANDING OF THE PROBLEMS IN EACH REGION.

THE OVERALL APPROACH TO THIS TASK WAS ONE OF SURVEYING, RATHER THAN EVALUATING, THE GENERAL ADMINISTRATIVE MANAGEMENT TRENDS IN THE REGION.

TECHNICAL ASSISTANCE

THE PROGRAM MANAGEMENT PROCEDURES MANUAL STATES THAT TA MAY INCLUDE PROVIDING TO THE APPLICANTS SAMPLES OF SUCCESSFUL PROGRAMS AND PRACTICES DESIGNED TO OVERCOME THE EDUCATIONAL DISADVANTAGES OF MINORITY GROUP ISOLATION. THE MAJORITY OF THE PM'S DO NOT PROVIDE THE SAMPLE PROGRAM FOR SEVERAL REASONS. THEY BELIEVE THE APPLICANT MIGHT WRITE ONE JUST LIKE IT BUT PERHAPS NOT GET FUNDED WHICH COULD CAUSE PROBLEMS FOR THE REGIONAL OFFICE. ONE REGION HAS DEVELOPED SAMPLES OF PARTICULAR PROPOSAL COMPONENTS SUCH AS NEEDS ASSESSMENT, EVALUATION, AND ACTIVITY DESCRIPTION BY TAKING EXCERPTS OF THESE TOPICS FROM NUMEROUS PROPOSALS.

IN GENERAL, HOWEVER, THE PM'S FEEL UNLESS HEADQUARTERS WANTS TO ISSUE GUIDELINES AS TO WHAT A SUCCESSFUL PROGRAM IS THEY WILL ADHERE TO WHAT THEY FEEL ARE GOOD FEATURES OF GRANTSMANSHIP.

GENERAL COUNSEL'S INTERPRETATIONS OF REGULATIONS ARE BEING MADE IN THE REGIONS ON ISSUES THAT MIGHT SURFACE AGAIN IN OTHER PARTS OF THE COUNTRY. THESE OPINIONS ARE NOT, HOWEVER, BEING DISSEMINATED TO THE OTHER REGIONS. THE PM'S AGREE THAT A COMPLETE COMPILATION OF PRECEDENTS IS NEEDED AND WOULD BE OF VALUE TO THEM WHEN GIVING TECHNICAL ASSISTANCE.

ALTHOUGH USOE PROVIDES PROGRAM POLICY DISSEMINATION THROUGH PERIODIC ISSUANCE OF ADMINISTRATIVE BULLETINS, MOST PM'S FEEL THEY DO NOT PROVIDE THE COMPREHENSIVE UP-DATING NECESSARY.

THERE APPARENTLY AREN'T ANY SAFEGUARDS TO PREVENT SEA OR GAC PERSONNEL FROM WRITING PROPOSALS USING FEDERAL FUNDS. THE PM'S STATED THEY TELL THEM NOT TO DO SO BUT THAT THEY WOULD HAVE TO STAY WITH THEM CONSTANTLY TO ACTUALLY PROHIBIT IT.

THERE IS ALSO NO SATISFACTORY WAY TO DETERMINE THAT NONFEDERAL MONEY WAS USED TO PAY CONSULTANTS EMPLOYED BY ACTIVE GRANTEEES FOR DEVELOPING PROPOSALS. ALTHOUGH THE GRANTEEES MUST MAINTAIN A CONSULTANT FILE GIVING INFORMATION CONCERNING EMPLOYED CONSULTANTS, PM'S AGREED THAT IT IS POSSIBLE FOR SCHOOL DISTRICTS TO CIRCUMVENT THESE MEASURES, E.G. BY MAKING AN AGREEMENT TO USE THAT PERSON LATER IN THE PROGRAM IN EXCHANGE FOR DEVELOPING THE PROPOSAL.

THERE SEEMS TO BE NO STANDARDIZED, ORGANIZED ANALYSIS OF THE TECHNICAL ASSISTANCE BEING GIVEN BY THE PROGRAM OFFICERS IN THE MAJORITY OF THE REGIONS. THERE IS NO ANALYSIS:

- 1) OF REPORTS TO ASCERTAIN THE QUALITY AND QUANTITY OF TECHNICAL ASSISTANCE BEING DELIVERED AND WHY IT IS NECESSARY FOR REPEATED TECHNICAL ASSISTANCE FOR OLD GRANTEEES WHEN THERE ARE VERY FEW CHANGES IN REGULATIONS OR EVEN PROGRAMS FROM YEAR TO YEAR.
- 2) TO DETERMINE WHICH APPLICANTS REQUIRE THE MOST DEVELOPMENTAL TECHNICAL ASSISTANCE AND WHY.

- 3) AS TO WHETHER THERE IS A CORRELATION BETWEEN THE NUMBER OF TECHNICAL ASSISTANCE VISITS MADE BY THE PROGRAM OFFICER AND THE COMPLEXITY OF THE GRANT, THE NEWNESS OF THE PROGRAM, ETC.
- 4) AS TO WHAT GIVES THE CLIENTS THE MOST PROBLEMS AND WHAT COULD BE DONE TO REMEDY THE SITUATION.
- 5) OF WHETHER THERE IS ANY CORRELATION BETWEEN THE AMOUNT OF TA (VISITS, PHONE CALLS, MEMO'S) GIVEN AN APPLICANT AND THE SCORING GIVEN A PROPOSAL BY PANELISTS.

APPARENTLY AFTER FIVE YEARS OF ESAA, THERE IS NO TECHNICAL ASSISTANCE PHILOSOPHY EVOLVING.

PROGRAM DISSEMINATION

ALL PROGRAM MANAGERS STATED THAT THEY DO NOT USE THE 1973 EDITIONS OF THE LEA AND NPO PROGRAM MANUALS WHEN DISSEMINATING INFORMATION BECAUSE THEY HAVE NOT BEEN PUBLISHED IN THE FEDERAL REGISTER. LAST YEAR, THEY WERE TOLD BY HEADQUARTERS THEY COULD NOT USE ANYTHING WHICH HAD NOT BEEN SO PUBLISHED. THEY BELIEVE, HOWEVER, THAT THESE MANUALS ARE OF VALUE AND WOULD LIKE TO SEE THEM PRINTED SO THEY COULD BE UP-DATED AND LEGITIMATELY UTILIZED. INTERESTINGLY, ALMOST ALL PM'S INTIMATED THAT THESE MANUALS ARE BEING USED AND THERE ARE MANY COVERT WAYS OF GETTING THEM TO THEIR CONSTITUENTS.

SPECIAL PROJECTS ARE MENTIONED AT INFORMATION MEETINGS IN ALL REGIONS BUT ONLY TO THE EXTENT OF GIVING THE NAME OF USOE AND ESAA SPECIAL PROJECTS DIRECTOR AND THE WAY IN WHICH TO CONTACT HIM. LATER, THE REGIONAL STAFF ARRANGES LOGISTICS WHEN DR. FAGEN ARRIVES TO HOLD MEETINGS. THEY DISSEMINATE NO MATERIALS AND APPARENTLY ARE NOT PERMITTED TO GIVE ANY FORM OF TECHNICAL ASSISTANCE TO PROSPECTIVE CLIENTS. REGIONAL MANAGERS POINT OUT THAT P.L. 93-380 STRESSES REGIONAL OFFICES SHOULD PROVIDE TA AND INFORMATION CONCERNING EDUCATIONAL PROGRAMS ON A PRE AND POST GRANT AWARD BASIS.

THE CHIEF COMPLAINT AMONG THE PM'S WAS THE ADMINISTRATIVE NIGHTMARE THAT IS PRODUCED BY THE ARRANGEMENT OF HAVING ALL SPECIAL PROJECTS COMPLETELY MANAGED OUT OF WASHINGTON, DC, WITHOUT ANY FORMAL ONGOING LINKAGE WITH THE REGIONS. TO ILLUSTRATE THIS POINT, THE MANAGERS GAVE

EXAMPLES OF PROBLEMS CAUSED WHEN ONE SCHOOL DISTRICT RECEIVES BOTH A BASIC GRANT UNDER REGIONAL MONITORING AND A GRANT UNDER THE SPECIAL EMERGENCY SET-ASIDE WHICH IS COMPLETELY MONITORED BY HEADQUARTERS.

THEY ALSO FEEL THEY LOSE CREDIBILITY BECAUSE HEADQUARTERS' INTERPRETATION OF REGULATIONS UNDER SPECIAL PROJECTS APPEAR TO DIFFER FROM THOSE EMPLOYED BY REGIONAL COUNSEL.

APPLICATION REVIEW PROCESS

THE MINIMUM DATA THAT EACH APPLICATION MUST CONTAIN TO BE CONSIDERED FOR REVIEW INCLUDES A DESEGREGATION PLAN OR PREVENTION PLAN, A COMPLETED PROGRAM NARRATIVE, AND A COMPLETED BUDGET. THE LENGTH OF TIME THE APPLICANTS HAVE TO TRANSMIT THE REMAINDER OF ESAA PROPOSAL REQUIREMENTS HAS NOT BEEN DESIGNATED IN THE MANUAL SO IT VARIES FROM REGION TO REGION.

TWO PROGRAM MANAGERS STATED THAT THIS SUBMISSION OF MINIMUM DATA NEVER OCCURRED IN THEIR REGIONS. ONE PROGRAM MANAGER INDICATED THAT HE ALLOWS THE APPLICANT TO HAVE 24 TO 48 HOURS. EVEN THOUGH THE MANUAL SPECIFIES THAT THE APPLICATION REVIEW PROCESS CAN BEGIN WITH THIS AMOUNT OF INFORMATION, ONE PROGRAM MANAGER GIVES HIS APPLICANTS UNTIL THE POINT OF GRANT AWARD (OVER ONE MONTH), WHILE YET ANOTHER WAITS UNTIL THE RESUBMIT DATE TO DEMAND THE COMPLETED APPLICATION. THE REMAINING PROGRAM MANAGERS STATED THAT THE TYPE AND AMOUNT OF DATA NEEDED WERE THE DETERMINING FACTORS AS TO THE TIME ALLOWED.

BY USING ONLY THIS MINIMUM DATA CRITERIA, ADVISORY COUNCILS NEED NOT BE CREATED, NOR PUBLIC HEARINGS ON ESAA APPLICATIONS BE HELD UNTIL AFTER THE PROPOSALS ARE REVIEWED AND SCORED BY THE PANELISTS. THIS IS OPPOSED TO THE INTENT OF CONGRESS AND THE REGULATIONS ACCORDING TO SEVERAL PROGRAM MANAGERS.

PROPOSAL PROCESSING

THE PROGRAM MANAGERS AGREE THAT THE PROCESSING OF PROPOSALS IS TOO COMPLICATED AND TAKES TOO LONG. THE FORMS ARE REPETITIVE AND VOLUMINOUS. THERE IS A DEFINITE NEED TO CONSOLIDATE THESE FORMS. ONE PROGRAM MANAGER PLANNED TO DEVELOP HIS OWN FORMS FOR USE IN THE REGION AS THE EXISTING FORMS ARE NOT ADEQUATE. OTHER PROGRAM MANAGERS HAVE ALREADY DONE SO. EVEN THOUGH THE REGIONS ARE REQUIRED TO COMPLETE VOLUMINOUS FORMS PERTAINING TO ESAA, HEADQUARTERS DOES NOT USE FORMS WHEN MAKING CHANGES IN OR RECOMMENDATIONS ABOUT A PROPOSAL. THE CHANGES APPARENTLY ARE MADE IN RESPONSE TO VERBAL QUESTIONS AND THERE ARE NO FORMS THAT BECOME A PART OF THE REGIONAL RECORDS.

OTHER SUGGESTIONS WERE MADE FOR IMPROVING THIS PHASE OF THE PROGRAM BUT THE CONSENSUS OF OPINION IS THAT THERE IS TOO MUCH PAPERWORK.

APPLICATION REVIEW PROCESS - THE MAJORITY OF THE PROGRAM MANAGERS AND PROGRAM OFFICERS AGREED THAT THE PROPOSALS SCORED AT THE BEGINNING OF THE WEEK TEND TO GET LOWER SCORES BECAUSE THE PANELISTS ARE MORE CRITICAL THAN THOSE PROPOSALS SCORED LATER IN THE WEEK WHEN THE PANELISTS ARE TIRED AND ANXIOUS TO COMPLETE THEIR TASK. THIS IDEA HAD SEEMINGLY NOT OCCURRED TO THEM BEFORE BUT THEY FELT IT WAS NOT A CRITICAL ENOUGH ISSUE TO TAKE MEASURES TO ENSURE THAT A REPEATER WHO WAS PANELED EARLY THIS YEAR WOULD BE REVIEWED LATER IN THE WEEK NEXT YEAR. THEY FURTHER STATED THAT THE LARGER AND MORE COMPLEX PROPOSALS

ARE SCORED BY SPECIALLY DESIGNATED PROFICIENT PANELS AND USUALLY EARLY IN THE REVIEW PERIOD. PERHAPS THE TIME OF REVIEW AND THE TYPE OF PANELISTS UTILIZED INSTEAD OF POOR PROPOSAL WRITING EXPLAINS WHY LARGE DISTRICTS TEND TO SCORE LOWER THAN SMALLER DISTRICTS.

PRE-PANEL BUDGET REVIEW OF PROPOSAL - IT IS NO LONGER POSSIBLE TO ELIMINATE EXCESSIVE AND UNALLOWABLE COST ITEMS WHICH ARE RELATED TO A PROGRAM COMPONENT PRIOR TO PANEL REVIEW IF ONE ADHERES TO THE NEW PROCEDURES.

THEREFORE, IT IS NOW POSSIBLE FOR A PANEL TO GIVE HIGH SCORES TO A PROPOSAL BASED ON A COMPONENT WHICH COULD BE DELETED AT THE FINAL STAGES BECAUSE IT IS UNALLOWABLE. ALL PM'S FEEL THE PRE-PANEL ADMINISTRATIVE BUDGET REVIEW SHOULD BE REINSTATED.

THE PM'S ALSO BELIEVE THEY SHOULD BE PERMITTED TO USE DISCRETIONARY AND REASONABLE METHODS BASED ON PAST EXPERIENCE WITH THE APPLICANT TO PREVIEW THE PROPOSAL BEFORE GIVING IT TO THE PANELISTS -- NOT ONLY FOR STRICTLY UNALLOWABLE COST, BUT FOR EXCESSIVE UNREASONABLE COST.

PRE-GRANT SITE REVIEWS - MOST OF THE PROGRAM MANAGERS SEE NO VALUE IN CONTINUING THE PRE-GRANT SITE REVIEWS FOR THE NEW APPLICANTS IN THE \$500,000 AND ABOVE RANGE. MOST OF THE DATA THEY COLLECT IS STATISTICAL DATA WHICH WOULD REQUIRE COUNTING HEADS, AND WOULD TAKE TOO LONG TO COMPLETE -- TOO MUCH MANPOWER TO CHECK ON EVERYTHING. WAIVERS HAVE BEEN OBTAINED BY SOME REGIONS, BUT OTHERS HAVE SIMPLY OMITTED THE REVIEWS.

PANELING PROCESS

THE PANELING PROCESS DIFFERS IN SUBTLE WAYS FROM REGION TO REGION. IT APPEARS TO BE ONE OF THE ASPECTS OF THE ESTABLISHED MANAGEMENT PROCEDURES THAT IS MORE SENSITIVE TO INTERPRETIVE JUDGMENT.

SPECIFIC EXAMPLES FOLLOW:

- 1) ALL PROGRAM MANAGERS DO NOT AGREE AS TO THE DEFINITION OF A CLASSROOM TEACHER OR A COMMUNITY PERSON. IN SOME AREAS, A TEACHER MUST BE PRESENTLY PRACTICING IN AN ELEMENTARY OR SECONDARY SCHOOL WHILE OTHERS WOULD ACCEPT ANYONE WITH ELEMENTARY OR SECONDARY SCHOOL EXPERIENCE. A COMMUNITY PERSON COULD BE ANYONE IN THE COMMUNITY IN SOME REGIONS. OTHERS REQUIRED THAT THE INDIVIDUAL BE ACTIVE IN SPECIFIC TYPES OF SCHOOL AFFILIATED ORGANIZATIONS.
- 2) THERE DOES NOT SEEM TO BE ANY STANDARDIZED CRITERIA BY WHICH TO ASCERTAIN WHETHER THE PANELISTS HAVE TRUE KNOWLEDGE OF AND EXPERIENCE IN SCHOOL DESEGREGATION. THE MAJORITY OF THE PM'S STATED THAT THE ONLY WAY THEY HAVE TO DETERMINE THIS IS BY THE PANELIST'S VITA OR RECOMMENDATIONS OF OTHER PERSONS. THE MANUAL GIVES NO INDICATION AS TO HOW "EXPERT" PANELISTS NEED TO BE IN THESE AREAS.

- 3) THE PANELISTS' TRAINING SESSION COVERS A DIFFERENT SPAN OF TIME IN MOST REGIONS SINCE THERE IS NO SPECIFIED TIME IN THE MANUAL. THE LENGTH OF THE SESSION LASTS FROM FOUR HOURS IN ONE REGION TO THREE DAYS IN ANOTHER REGION WITH THE AVERAGE LENGTH OF TIME BEING ONE DAY. SEVERAL PM'S COMMENTED THAT A PANELIST'S ATTENTION SPAN WAS NOT LONG ENOUGH FOR MORE THAN A HALF DAY SESSION, WHILE OTHERS STATED THAT THEIR PANELISTS WERE EAGER TO HAVE A LONGER TRAINING PERIOD.
- 4) SAMPLES OF PROPOSALS ARE NOT USED IN ALL REGION'S PANEL TRAINING SESSIONS, EVEN THOUGH THE MANUAL MAKES A SUGGESTION TO THAT EFFECT. ONE PM LETS THE PANELISTS REVIEW THEIR SCORING OF THE FIRST PROPOSAL AFTER THEY HAVE FULLY READ AND SCORED THE SECOND PROPOSAL AS A MEANS OF COMPARISON AND ADDITIONAL TRAINING. ANOTHER PM BELIEVES THAT USING A SAMPLE PROPOSAL WOULD BE TOO CONFUSING TO THE PANELISTS. A THIRD PM USES EXAMPLES OF INDIVIDUAL SECTIONS OF PROPOSALS WHICH ARE WELL-WRITTEN INSTEAD OF COMPLETE PROPOSALS BECAUSE HE FEELS THAT IF ANOTHER PROPOSAL WERE WRITTEN IN THE SAME MANNER, THAT PROPOSAL WOULD BE RATED QUITE HIGH.

- 5) A RATING CRITERIA SCALE CONTAINED IN THE REGULATIONS SPECIFIES THE MAXIMUM LEVEL OF POINTS A PROPOSAL CAN RECEIVE ON EACH SECTION AND DESIGNATES WHAT IT SHOULD CONTAIN TO RECEIVE THESE POINTS. HOWEVER, THERE APPARENTLY ARE NO GUIDELINES GIVEN TO THE REGIONAL OFFICES TO AID THE PANELISTS WHEN THEY ARE RATING PROPOSALS WHICH FALL BELOW MAXIMUM LEVEL. THE PANELISTS ARE MERELY TOLD THAT THEY MUST JUSTIFY THE SCORES WHICH FALL BELOW MAXIMUM LEVEL WHEN MAKING THEIR COMMENTS.
- 6) THERE IS AN INDICATION THAT THE PM'S SET THE STAGE SUBTLY WHEREBY THE PANELISTS ARE NOT EXPECTED TO VARY GREATLY IN THEIR SCORING. THE PANELISTS ARE GIVEN SUCH DIRECTIVES AS: BE CONSISTENT WITH THE OTHERS, BE ABLE TO JUSTIFY A DEVIATION, LOOK AT YOUR SCORES AGAIN IF THERE IS A WIDE SPREAD, COMPARE YOUR SCORES, LOOK CLOSELY AT DISCREPANCIES IN SCORES, ETC. THIS MIGHT HAVE AN EFFECT ON THE ACTUAL OVERALL SCORING OF PROPOSALS. IN ONE CASE, PANELISTS WERE ACTUALLY INSTRUCTED THAT THEY COULD NOT VARY MORE THAN FIVE POINTS ON THE PROPOSALS THEY WERE SCORING.

- 7) THE INTERNAL OPERATION OF THE PANEL ALSO VARIES. SOME REGIONS HAVE PANEL CHAIRMEN OR LEADERS WHO ARE SELECTED BY THE PANELISTS THEMSELVES, OTHERS HAVE CHAIRMEN CHOSEN BY THE PM'S OR THROUGH A NUMERICALLY ASSIGNED RANDOM SELECTION. THE CHAIRMEN HAVE DIFFERENT RESPONSIBILITIES, AGAIN, DEPENDING ON THE REGION. THESE INCLUDE DISTRIBUTING THE PROPOSALS TO THE INDIVIDUAL REVIEWERS, LOOKING AT THE TIME LINES TO SEE THAT THE MATERIAL IS COMPLETED, DETERMINING AMBIGUOUSNESS OF COMMENTS, AND SUMMARIZING THE WEAKNESSES OF THE PROPOSALS. SOME PANELS ARE REQUIRED TO STAY TOGETHER DURING THE ENTIRE OPERATION IN A SPECIFIC LOCALITY FOR A SPECIFIC TIME EACH DAY. ANOTHER REGION ALLOWS ITS PANEL CHAIRMEN TO DETERMINE THE WORKING ARRANGEMENTS AS LONG AS A CERTAIN NUMBER OF PROPOSALS ARE DONE AT THE END OF THE WEEK. NO GUIDELINES APPARENTLY HAVE BEEN GIVEN TO THE REGIONAL OFFICES AS TO WHAT THE ACTUAL PROCEDURE SHOULD BE.
- 8) THE LENGTH OF TIME THE PANELISTS ARE PERMITTED TO RETAIN THEIR APPLICATION TECHNICAL REVIEW FORMS AFTER COMPLETION OF THE REVIEW VARIES FROM REGION TO REGION SINCE NO LIMITATIONS ARE SPECIFIED IN THE MANUAL. AT LEAST ONE REGION ALLOWS THE PANELISTS TO KEEP THEM FOR THE ENTIRE WEEK AND TO MAKE CHANGES AT ANY TIME AT THEIR OWN DISCRETION.

ANOTHER REGION ALLOWS THEM TO KEEP THE FORMS UNTIL COMPLETION OF A COMPETITIVE GROUP OF PROPOSALS. THE REMAINDER OF THE REGIONS EITHER COLLECT THEM AT THE END OF THE DAY OR IMMEDIATELY AFTER THE SCORING ON EACH PROPOSAL IS FINISHED.

- 9) THERE SEEMS TO BE NO EVALUATION PROCEDURE UTILIZED TO DETERMINE BEFOREHAND THE ABILITY OF THE PANELISTS TO COMPREHEND THE REGULATIONS AND THE DESEGREGATION OR RACIAL ISOLATION REDUCTION OR ELIMINATION PLAN AND HOW IT RELATES TO PROGRAMMATIC ASPECTS. THERE IS NOT EVEN AGREEMENT AMONG THE PM'S AS TO THE DIFFICULTY OF COMPREHENSION OF ESAA REGULATIONS AND DESEGREGATION PLANS. TWO PM'S STATED THAT THE PANELISTS ARE SO THOROUGHLY TRAINED IN THE TRAINING SESSION THAT THEY ARE CONFIDENT THEY UNDERSTAND THEM. OTHERS CHECK ON THE ADEQUACY OF THEIR REMARKS AFTER THE PROPOSAL HAS BEEN SCORED. THE MAJORITY OF PM'S CLAIM THE ROLE OF THEIR PROGRAM OFFICER IS TO HELP THE PANELIST UNDERSTAND THE REGULATIONS, THE PLAN, OR OTHER CHARACTERISTICS OF THE SCHOOL DISTRICT THROUGHOUT THE PROCESS.

- 10) IT SEEMS TO BE THE CASE THAT THE ONLY MEASURES TAKEN TO PREVENT DISCUSSION AND UNWARRENTED DISCLOSURES OF INFORMATION BETWEEN INDIVIDUALS OR GROUPS OF PANELISTS DURING THE TIME THAT THEY ARE TOGETHER IN HOTELS OR READING PROPOSALS IN THE SELECTED SITES IS TO INFORM THEM VERBALLY THAT IT SHOULD NOT BE DONE. IT WAS STATED THAT THIS IS NOT SUFFICIENT BECAUSE INFORMATION STILL LEAKS OUT.

RESUBMIT PROCESS

THE MAJORITY OF THE PROGRAM MANAGERS AND PROGRAM OFFICERS DO NOT LIKE THE NEW RESUBMIT PROCESS AND WOULD PREFER TO RETURN TO THE ORIGINAL WAY OF HANDLING IT. LISTED BELOW ARE THE WEAKNESSES WHICH, IN THEIR OPINIONS, ARE INHERENT IN THE PROCESS:

- 1) PROBLEMS WITH THE POST OFFICE I.E. DANGER OF ITEMS GETTING LOST IN THE MAIL, HIGH MAILING COSTS.
- 2) TIME FRAME IS TOO SHORT.
- 3) PROGRAM OFFICERS ARE NOT THERE TO RESPOND TO QUESTIONS.
- 4) \$20.00 STIPEND PER PROPOSAL NOT ENOUGH - ESPECIALLY FOR THE LARGE COMPLICATED PROPOSALS.
- 5) LOSS OF CONTROL OVER PANELISTS - THEY COULD POSSIBLY HAVE SOMEONE ELSE READ FOR THEM.
- 6) TOO MANY PROJECTS FROM DIFFERENT STATES ARE READ BY ONE PANELIST MAKING IT CONFUSING TO SORT OUT ALL THE COMMENT SHEETS AND REASSEMBLING THEM.
- 7) PROVIDING EACH REVIEWER WITH COPIES OF THE RATINGS DONE BY ALL THE MEMBERS ON HIS/HER PANEL.

- 8) DIFFICULTY THE PANELISTS HAVE COMMUNICATING WITH EACH OTHER. MOST REGIONS ALLOW THE PANELISTS TO CONTACT EACH OTHER BY TELEPHONE, BUT NOT ALL REIMBURSE THEM FOR LONG DISTANCE CALLS.

EVALUATION

IN THE MAJORITY OF THE REGIONAL OFFICES THERE APPEARS TO BE NO SYSTEMATIC WAY OF REVIEWING AND USING THE EVALUATION REPORTS WHICH HAVE BEEN DONE ON A NATIONAL SCALE THROUGH OE, SUCH AS ESAA I, ESAA II, ESAA III, OR EVEN THE OLD ESAP AND GAO REPORTS.

THE PROGRAM MANAGERS AND PROGRAM OFFICERS OFFERED A WIDE-RANGE OF REASONS FOR NOT USING THEM. SEVERAL STATED THAT THEY DID NOT RECEIVE THE REPORTS, WHILE ALL OF THEM CLAIMED THERE WAS NO DIRECTION FROM WASHINGTON CONCERNING WHAT TO DO WITH THE INFORMATION OR HOW TO UTILIZE THE RESULTS EFFECTIVELY.

MOST OF THE PM'S FELT THAT THE EVALUATION OF THE PROGRAMS, WHETHER ON THE NATIONAL LEVEL OR THOSE REQUIRED OF THE INDIVIDUAL GRANTEE, ARE MEANINGLESS WHEN PLACED IN THE LIGHT OF POLITICAL FUNDING REALITIES.

TRAINING OF REGIONAL OFFICE STAFF

ALL PM'S AGREE THAT THERE IS A NEED FOR CONSISTENT, SYSTEMATIC TRAINING TO BE GIVEN BY QUALIFIED PERSONNEL TO THEIR STAFFS. IT SEEMS TO BE THE CONSENSUS OF OPINION THAT THE TRAINING MEETINGS THAT ARE HELD JUST BEFORE ESAA FUNDING CYCLES BY DC-EEO COULD BE BETTER CLASSIFIED AS INFORMATION DISSEMINATION MEETINGS.

PRESENTLY, THE PROGRAM MANAGERS AND PROGRAM OFFICERS MUST DEVELOP THEIR OWN PERSONALIZED, INDIVIDUALIZED INTERPRETATION AND FRAME OF REFERENCE CONCERNING ESAA. THIS DOES NOT LEAD TO CONSISTENCY EITHER THROUGHOUT THE NATION OR EVEN THROUGHOUT A SINGLE REGION.

ADDITIONALLY, THE MANAGEMENT PROCEDURES MANUAL STIPULATES THAT THE TRAINING OF THE NONFEDERAL PANEL MEMBERS SHOULD BE ACCOMPLISHED THROUGH SCHEDULED TRAINING SESSIONS WITH INSTRUCTION BY SPECIALLY TRAINED PROGRAM OFFICERS. YET, WHEN ASKED WHAT THE SPECIAL TRAINING WAS THAT THE PERSON RESPONSIBLE FOR TRAINING NONFEDERAL PANELISTS ACTUALLY RECEIVED, THE PROGRAM MANAGERS INVARIABLY RESPONDED THAT THERE WAS NOT ANY.

THEY COMPLAINED OF THE LACK OF AVAILABILITY OF TRAINING FUNDS AND THE POOR LEADERSHIP FROM DC HEADQUARTERS IN THIS AREA. SEVERAL PM'S ALLUDED TO THE REOCCURRING FACT THAT ESAA AND TITLE IV LOCAL AND STATE PERSONNEL HAVE MORE FUNDS TO ATTEND INSERVICE TRAINING FUNCTIONS SUCH

AS NATIONAL CONFERENCES, THAN REGIONAL PERSONNEL WHO SHOULD BE THE TA EXPERTS. ALL THE PM'S SUGGESTED THAT USOE HEADQUARTERS ESTABLISH AT LEAST ONE ANNUAL NATIONAL TRAINING SEMINAR FOR ALL EEO PM'S AND PO'S.

PROGRAM OFFICER ASSIGNMENTS

A GROWING NUMBER OF PM'S ARE REALIZING THAT PO ASSIGNMENTS SHOULD BE CHANGED AT LEAST EVERY TWO YEARS. ALTHOUGH THEY SEE THE BENEFITS DERIVED FROM HAVING ONE PERSON FAMILIAR WITH ONE AREA, THEY REALIZE THE DANGER INHERENT IN MAINTAINING SUCH A SYSTEM.

E.g.

- 1) BECOMING AN OMBUDSMAN FOR A PARTICULAR DISTRICT.
- 2) NOT PERFORMING CAREFUL MONITORING PROCEDURES.
- 3) MAINTAINING A GRUDGE AGAINST A PARTICULAR DISTRICT OR PARTICULAR ESAA PROGRAM.
- 4) UNFAIR TO THE OTHER PO'S WHO MIGHT NOT HAVE A DESIRABLE GEOGRAPHIC AREA.
- 5) CREATES UNEVEN WORK LOADS.

NACEEO VISITATIONS

OVERWHELMINGLY, USOE PM'S AND PO'S, AND EVEN SEVERAL ASSISTANT REGIONAL COMMISSIONERS FELT THAT COUNCIL MEMBERS SHOULD SPEND MORE TIME IN THE REGIONS. THEY SHOULD DO MORE VISITATIONS TO PROJECTS AND MORE MONITORING WITH PROJECT OFFICERS. THEY SHOULD ALSO FOLLOW PROPOSALS THROUGH THE COMPLETE PANELING PROCESS. THEY FELT THAT THE SUPPORTIVE EFFECT PRODUCED BY NACEEO MEMBERS SPENDING MORE TIME IN THE FIELD WOULD ENHANCE THE OVERALL ESAA PROGRAM.

HANDBOOK FOR INTEGRATED EDUCATION

ONLY TWO REGIONS WERE AWARE OF THE EXISTENCE OF THE "HANDBOOK FOR INTEGRATED EDUCATION" PUBLISHED IN JULY, 1976. MOST PROGRAM MANAGERS STATED THAT IF IT WERE BEING UTILIZED BY ANY ONE OF THEIR CURRENT OR PROSPECTIVE ESAA CLIENTS, THEY WOULD BE SURPRISED. EVEN IN THE TWO REGIONS THAT WERE FAMILIAR WITH IT, THE HANDBOOK HAD NOT BEEN USED IN ANY TRAINING SESSION WITH SCHOOL DISTRICTS OR AS A MEANS OF INSERVICE TRAINING.

AS OF APRIL 8TH, 1977, ACCORDING TO INFORMED SOURCES, OVER 20,283 COPIES OF THE HANDBOOK HAD BEEN MAILED OUT TO SCHOOL DISTRICTS NATIONWIDE.

THE HANDBOOK WAS BASED ON DATA OBTAINED FROM AN EMERGENCY SCHOOL AID PROGRAM FUNDED EVALUATION STUDY PERFORMED BY THE EDUCATIONAL TESTING SERVICE COSTING APPROXIMATELY \$1 MILLION. ADDITIONAL FIELD STUDIES, CASE STUDIES, AND DEBRIEFING SESSIONS WERE ALSO CARRIED OUT IN ORDER TO DEVELOP THE HANDBOOK. IT IS NOT KNOWN WHETHER THIS ADDITIONAL WORK RESULTED IN INCREASED COST UNDER THE ESAP EVALUATION SET-ASIDE OR HAD TO BE ABSORBED UNDER THE ESAA EVALUATION SET-ASIDE. THE EXPENSES AMOUNTING TO \$20,881 INCURRED IN THE PRODUCTION AND PRINTING OF 80,000 COPIES OF THE HANDBOOK WERE CHARGED TO THE ESAA EVALUATION SET-ASIDE. THE AMOUNT REQUIRED TO DISTRIBUTE COPIES OF THE HANDBOOK WAS NOT AVAILABLE.

AS FAR AS COULD BE ASCERTAINED FROM REGIONAL INPUT, NO FORMAL SURVEY OR INQUIRY WAS INITIATED IN ORDER TO DETERMINE WHETHER A NEED FOR A HANDBOOK WAS OF CRITICAL SIGNIFICANCE. THE ONLY PROGRAM MANAGER WHO DID READ THE BOOK WAS SURPRISED BY ITS LACK OF SOPHISTICATION.